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Attorneys for Plaintiffs and Third-Party Defendants the Sports Shinko Companies

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

SPORTS SHINKO CO., LTD.,) CV 04-00124 BMK
) CV 04-00127 BMK
Plaintiff,)) CONSOLIDATED CASES
vs.	
QK HOTEL, LLC, et al.,) SPORTS SHINKO'S MOTION) TO SEAL OR PERMIT) REDACTION OF
Defendants, and	CONFIDENTIAL INFORMATION;

FRANKLIN K. MUKAI, et al., Third-Party Plaintiffs, vs. SPORTS SHINKO (USA) CO., LTD., et al., Third-Party Defendants, and SPORTS SHINKO (HAWAII) CO., LTD., et al., Third-Party Defendants/ Counterclaimants, VS. QK HOTEL, LLC, et al., Third-Party Counterclaim Defendants. AND CONSOLIDATED CASES

MEMORANDUM IN SUPPORT OF MOTION; SCHEDULE OF PROPOSED REDACTED/ SEALED EXHIBITS, **DECLARATIONS, &** PLEADINGS; EX. "A" (PROPOSED ORDER **GRANTING MOTION);** CERTIFICATE OF SERVICE

SPORTS SHINKO'S MOTION TO SEAL OR PERMIT REDACTION OF CONFIDENTIAL INFORMATION

Plaintiff and Third Party Defendants Sports Shinko Co., Ltd., Sports Shinko (USA) Co., Ltd., Sports Shinko (Hawaii) Co., Ltd., Sports Shinko (Mililani) Co., Ltd., Sports Shinko (Kauai) Co., Ltd., Sports Shinko (Pukalani) Co., Ltd., Sports Shinko (Mililani) Co., Ltd., Sports Shinko (Waikiki) Corporation, and Ocean Resort Hotel Corporation (collectively "Sports Shinko"), hereby move this Court to allow them to file certain confidential information under seal or with redactions, in order to prevent disclosure in motions, pleadings, declarations, and exhibits (collectively "Filings") in the public record, as set forth in the attached Schedule of Proposed Redacted/Sealed Exhibits, Declarations & Pleadings and as set forth in proposed redacted Filings that will be lodged with the Filing Clerk.

This Motion is based upon the Memorandum in Support of Motion, the record herein, and any further submissions by Sports Shinko.

> Honolulu, Hawai'i, November 28, 2007. DATED:

> > /s/ Glenn T. Melchinger PAUL ALSTON BRUCE H. WAKUZAWA GLENN T. MELCHINGER JASON H. KIM

Attorneys for Plaintiffs and Third-Party-Defendants the Sport Shinko Companies